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March 26, 2020

Via ECF

Hon. Vincent Briccetti
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: *Falls v. Rude et al.*, No. 7:17-cv-1339 (S.D.N.Y.) (VB)

Dear Judge Briccetti:

I represent the plaintiff, Raiquan Falls, and write after consultation with and upon the consent of defendants' counsel to request adjournment of the April 1, 2020 telephone conference in this matter. Specifically, the parties request a four-week adjournment until Wednesday, April 29, 2020.

The parties previously requested adjournments on December 17, 2019, February 10, 2020, and February 25, 2020 to allow the parties time to negotiate settlement. ECF Nos. 146, 148 and 151. The Court granted the previous requests. ECF Nos. 147, 149, 152. As noted previously, the parties have been negotiating in good faith. However, Lakeview Correctional Facility, where Mr. Falls is incarcerated, has prohibited me from speaking with my client by phone more than once every 30 days. This has slowed our progress. An adjournment would allow the parties to continue working towards a resolution.

In the event that a settlement is reached, the parties will promptly notify the court. Thank you for your consideration of this joint request.

Respectfully submitted,

/s/ David Rochelson
David Rochelson

cc: David L. Posner (*via ECF*)